

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

LEGO A/S and LEGO SYSTEMS, INC.

Plaintiffs/Counterclaim Defendants,

V.

Civil Action No.: 1:22-mc-20582-RNS

BEST-LOCK CONSTRUCTION TOYS, INC.,
BEST-LOCK LIMITED, HONG KONG, and
BEST-LOCK GROUP,

Defendants/Counterclaim Plaintiffs.

**PLAINTIFFS' MOTION REQUESTING ENTRY OF AN ORDER DIRECTING
DEFENDANTS TO COMPLETE FORM 1.977 FACT INFORMATION SHEET**

Plaintiffs LEGO A/S and LEGO Systems, Inc. (the “LEGO Group” or “Plaintiffs”), through undersigned counsel, hereby move this Court for entry of an Order pursuant to Fed. R. Civ. P. 69 and Fla. R. Civ. P. 1.560 directing the Defendants, Best-Lock Construction Toys, Inc. and Best-Lock Limited, Hong Kong (“Defendants”), to complete and furnish the attached Form 1.977, Fact Information Sheet, under oath, within forty-five (45) days of receipt. In support of this motion, Plaintiffs state as follows:

1. On or about November 8, 2021, the United States District Court for the District of Connecticut entered a final default judgment against Defendants Best-Lock Construction Toys, Inc. and Best-Lock Limited, Hong Kong (“Defendants”), jointly and severally, in the amount of \$1,122,972.29, plus post judgment interest (“Final Judgment”).

2. Pursuant to 28 U.S.C. § 1963, the Final Judgment was registered with this Court on February 25, 2022.

3. Under Federal Rule of Civil Procedure 69(a)(1), the procedure for executing judgment “must accord with the procedure of the state where the court is located.”

4. Florida Rule of Civil Procedure 1.560(a) allows judgment creditors to obtain discovery from judgment debtors in aid of executing on a judgment. Specifically, Florida Rule of Civil Procedure 1.560(b) provides that, at the request of the judgment creditor, the Court “shall order the judgment debtor or debtors to complete form 1.977, including all required attachments, within 45 days of the order or such other reasonable time as determined by the court.”

5. Plaintiff has attached Form 1.977, Fact Information Sheet (Exhibit 1), and requests that Defendants complete under oath and return the same to Plaintiffs’ counsel.

6. Plaintiff has attached a proposed order granting the instant motion (Exhibit 2).

WHEREFORE, Plaintiffs respectfully move for the entry of an Order (Ex. 2) directing the Defendants to complete under oath and furnish the attached Form 1.977, Fact Information Sheet (Ex. 1), within forty-five (45) days of receipt.

Dated: December 13, 2022

Respectfully submitted,

/s/ Georgia A. Thompson

Georgia A. Thompson

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 13, 2022, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I further certify that on December 13, 2022, the foregoing document and attachments are being served via First Class Mail¹ to the following non-CM/ECF participants:

- (1) Stephen Desmond Minsk,
Pinos Aloha Golf VII Fase, Num. 740 POR. BO EXC.4,
Urbanizacion Los Pinos Del Angel, 29660 Nueva Andalucia, Marbella, Malaga, Spain
- (2) Stewart Merkin
Best-Lock Construction Toys, Inc.
4450 Lake Road
Miami, FL 33137
- (3) Stewart Merkin
Best-Lock Construction Toys, Inc.
444 Brickell Ave #300
Miami, FL 33131
- (4) Best-Lock Limited Hong Kong & Best-Lock Group Limited
Unit 801, 8th Floor, Pacific House,
20 Queen's Road Central, Hong Kong SAR

/s/ Georgia A. Thompson
Georgia A. Thompson

¹ The LEGO Group has made good faith efforts to identify addresses associated with the Best-Lock defendants so that it may reasonably have notice of this Writ. The listed address (1) above was provided by Torsten Geller, Best-Lock Construction Toys, Inc.'s former director, in his notice of resignation to the U.S. District Court for the District of Connecticut, Case No. 11-cv-1586 (ECF No. 210). Address (2) is identified as the Registered Agent Address for Best-Lock Construction Toys, Inc. with the Florida Department of State, although the status of the corporation is inactive. Address (3) was identified by Best-Lock Construction Toys, Inc. as the principal place of business of Best-Lock Construction Toys, Inc. in its Answer with Affirmative Defenses filed with the U.S. District Court for the District of Connecticut, Case No. 11-cv-1586 (ECF No. 86.) Address (4) was identified by Best-Lock as the principal place of business of Best-Lock Group Limited and Best-Lock Limited, Hong Kong in its Answer with Affirmative Defenses. (*Id.*).